

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

vs.

NOTICE OF MOTION AND MOTION
16 MJ 147

MARGUIN SANCHEZ

Defendant.

PLEASE TAKE NOTICE, that the undersigned DOMINIC SARACENO, ESQ., attorney for the defendant, MARGUIN SANCHEZ, based upon that following affirmation hereby moves for an adjournment of the 48b date.

AFFIRMATION

1. I am an attorney at law duly licensed to practice in the State of New York and in the Western District of New York with offices located at 534 Delaware Avenue, Buffalo, New York 14202.

2. This affirmation is offered in support of counsel's request for an extension of the 48b date.

3. The Court previously entered a 48b date of March 31, 2017.

4. Defense counsel and the government continue to negotiate a resolution to this matter and are requesting additional time to do so.

5. The defense counsel is making this motion on behalf of MARGUIN SANCHEZ.

6. The defendant agrees that the additional time allowed is excludable under the Speedy Trial Act.

7. Assistant United States Attorney Brian Counihan consents to said request for adjournment.

WHEREFORE, for the reasons set forth above, defendant, MARGUIN SANCHEZ, respectfully requests an Order from this Court granting an extension of the 48b date for another 60 days.

/s/ Dominic Saraceno, Esq.

DOMINIC SARACENO, ESQ.
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Defendant.

CERTIFICATE OF SERVICE

16-MJ-147

I hereby certify that on March 28, 2017, I electronically filed the foregoing with the Clerk of the District Court using its CM/ECF system, which would then electronically notify the following EM/EF Participant on this case:

Brian Counihan, AUSA
138 Delaware Avenue
Buffalo, New York 14202

s/Dominic Saraceno

DOMINIC SARACENO